

Message

From: Lisa Rector [lrector@nescaum.org]
Sent: 8/17/2020 1:16:25 PM
To: Johnson, Steffan [johnson.steffan@epa.gov]
Subject: RE: ASTM 2779 and the NSPS
Attachments: ATT00001.txt

Thanks Stef. I feel like the more we look, the more rabbit holes we find 😊 Below is my image for the week.



From: Johnson, Steffan <johnson.steffan@epa.gov>
Sent: Monday, August 17, 2020 9:13 AM
To: Lisa Rector <lrector@nescaum.org>
Cc: Brashear, Angelina <Brashear.Angelina@epa.gov>; Toney, Mike <Toney.Mike@epa.gov>
Subject: RE: ASTM 2779 and the NSPS

Lisa,

Your question did take us down a rabbit hole a little ways, and the answer isn't written as clearly as it should likely be.

The rule language opens the possibility of 'other than Douglas fir' crib fuel, but only through an Alternate Test Method process. ASTM 2780 section 9.1 specifies Douglas fir.

Stef

From: Lisa Rector <lrector@nescaum.org>
Sent: Monday, August 17, 2020 7:29 AM
To: Johnson, Steffan <johnson.steffan@epa.gov>
Cc: Brashear, Angelina <Brashear.Angelina@epa.gov>; Toney, Mike <Toney.Mike@epa.gov>
Subject: RE: ASTM 2779 and the NSPS

Thanks Stef. Your email confirms what I originally thought, but because it also references ASTM 2780, which is what triggered the question. Does this mean that using Doug Fir for cribs tests is also a may rather than a shall?

From: Johnson, Steffan <johnson.steffan@epa.gov>
Sent: Monday, August 17, 2020 7:22 AM
To: Lisa Rector <lrector@nescaum.org>
Cc: Brashear, Angelina <Brashear.Angelina@epa.gov>; Toney, Mike <Toney.Mike@epa.gov>
Subject: RE: ASTM 2779 and the NSPS

Hi Lisa,

Use of the word “may” or “should” in EPA regulations always indicates that the described statement is optional and not mandatory.

If Douglas fir pellets were mandatory, the regulation would have used “shall” or “must”.

Thank you,

Stef

From: Lisa Rector <lrector@nescaum.org>
Sent: Sunday, August 16, 2020 3:08 PM
To: Johnson, Steffan <johnson.steffan@epa.gov>
Subject: ASTM 2779 and the NSPS

Stef 60.534 states that (f) Douglas fir may be used in ASTM E2779-10, ASTM E2780-10 and CSA B415.1-10 (IBR, see § 60.17). Does that mean that all ASTM 2779 testing should use Douglas Fir pellets?



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